

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

GEORGIA-PACIFIC CONSUMER  
PRODUCTS LP, et al.,

Plaintiffs,

Case No. 1:11-cv-00483-RJJ

v.

Hon. Robert J. Jonker

NCR CORPORATION, et al.,

Defendants.

---

**JOINT STIPULATION AND ORDER**

WHEREAS Georgia-Pacific Consumer Products LP, Fort James Corporation and Georgia-Pacific LLC (collectively, “GP”) filed a Motion for Protective Order on November 7, 2014 (the “Motion”) (ECF No. 646) to prevent NCR Corporation (“NCR”) from taking a Rule 30(b)(6) deposition of a GP corporate representative pursuant to NCR’s October 22, 2014, Notice and November 6, 2014, Amended Notice;

WHEREAS the Court granted GP’s Motion as to NCR’s October 22, 2014, Notice and denied GP’s Motion as to NCR’s November 6, 2014, Amended Notice by Memorandum and Order dated February 23, 2015 (the “Order”) (ECF No. 727);

WHEREAS the Court ordered that the November 6, 2014, Amended Notice may only be re-noticed if there is a minimum of 14 days notice and that the 30(b)(6) deposition shall be completed within 45 days of the date of the Court’s Order;

WHEREAS the current schedule for expert discovery includes depositions of approximately forty experts by May 1, 2015, which has precluded counsel for GP and counsel

for NCR from finding a mutually convenient date for the 30(b)(6) deposition that falls within 45 days of the date of the Court's Order (*i.e.*, April 9, 2015);

It is hereby stipulated and agreed that NCR will take the 30(b)(6) deposition of GP's corporate representative on April 22, 2015.

It is further stipulated and agreed that NCR will serve an amended notice of 30(b)(6) deposition on GP at least 14 days before the April 22, 2015, deposition.

It is further stipulated and agreed that no other deadline in this case shall be affected by entry of this joint stipulation and order.

Dated: March 27, 2015

Respectfully submitted,

NCR CORPORATION

/s/ David R. Marriott  
David R. Marriott  
*Counsel for NCR Corporation*

SIDLEY AUSTIN LLP  
John M. Heyde  
One South Dearborn Street  
Chicago, Illinois 60603  
Phone: (312) 853-7000  
Fax: (312) 853-7036  
jheyde@sidley.com

CRAVATH, SWAINE & MOORE LLP  
Evan R. Chesler  
David R. Marriott  
Darin P. McAtee  
825 Eighth Avenue  
New York, New York 10019  
Phone: (212) 474-1000  
Fax: (212) 474-3700  
dmarriott@cravath.com

MARTEN LAW PLLC  
Linda R. Larson  
Bradley M. Marten  
1191 Second Avenue, Suite 2200  
Seattle, Washington 98101  
Phone: (206) 292-2600  
Fax: (206) 292-2601  
llarson@martenlaw.com

DICKINSON WRIGHT PLLC  
Geoffrey A. Fields  
200 Ottawa Avenue, N.W., Suite 1000  
Grand Rapids, Michigan 49503  
Phone: (616) 336-1017  
Fax: (616) 458-6753  
gfields@dickinsonwright.com

GEORGIA-PACIFIC CONSUMER  
PRODUCTS, LP., FORT JAMES  
CORPORATION, AND  
GEORGIA-PACIFIC LLC

/s/ Michael R. Shebelskie  
Michael R. Shebelskie  
*Counsel for Georgia-Pacific Consumer  
Products, L.P., Fort James Corporation,  
and Georgia-Pacific LLC*

HUNTON & WILLIAMS LLP  
Michael R. Shebelskie  
Douglas M. Garrou  
George P. Sibley, III  
Paul T. Nyffeler  
John E. Beerbower  
951 East Byrd St., East Tower  
Richmond, VA 23219  
(804) 788-8200

VARNUM LLP  
Peter A. Smit  
Adam J. Brody  
Bridgewater Place, P.O. Box 352  
Grand Rapids, MI 49501  
(616) 336-6000

CIRESI CONLIN LLP  
Jan M. Conlin  
225 S. 6th Street  
Suite 4600  
Minneapolis, MN 55402  
(612) 361-8200

IT IS SO ORDERED.

Dated: March 31, 2015

/s/ Hugh W. Brenneman, Jr.  
Hon. HUGH W. BRENNEMAN, JR.  
U.S. Magistrate Judge